UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 16-CR-21 (WED)

SAMY M. HAMZEH,

Defendant.

THIRD PRETRIAL MOTION: MOTION TO PRODUCE GIGLIO AND BRADY MATERIAL **NINETY DAYS BEFORE TRIAL**

Samy Hamzeh, by counsel, files this motion requiring the government to turn over the Giglio and Brady material in this case 90-days before trial. The facts and law supporting this argument are set out in the contemporaneously filed omnibus memorandum.

Dated at Milwaukee, Wisconsin this 24th day of February, 2017.

Respectfully submitted,

/s/ Joseph A. Bugni Joseph A. Bugni, WI Bar #1062514 Craig W. Albee, WI Bar #1015752 FEDERAL DEFENDER SERVICES OF WISCONSIN, INC.

517 E. Wisconsin Ave - Rm 182

Milwaukee, WI 53202

Tel.: (414) 221-9900

E-mail: joseph_bugni@fd.org

craig_albee@fd.org

Counsel for Defendant, Samy M. Hamzeh